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Hobbes Equities Inc.*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SECURITIES AND EXCHANGE
COMMISSION

Plaintiff,

v.

HEMP, INC. a Colorado Corporation; BRUCE
J. PERLOWIN, an individual; BARRY K.
EPLING, an individual; JED M. PERLOWIN,
an individual; FERRIS HOLDING, INC., a
private Nevada Corporation; HOBBS
EQUITIES INC., a private Nevada Corporation;
DIVERSIFIED INVESTMENTS LLC, a private
Nevada Limited Liability Company; and
QUANTUM ECONOMIC PROTOCOLS LLC,
a private Nevada Limited Liability Company,

Defendants.

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and Exchange Commission*

CASE NO.: 2:16-cv-01413-JAD-PAL

**JOINT STIPULATION AND ORDER TO
EXTEND RESPONSE AND REPLY
DEADLINES FOR (1) PLAINTIFF'S
MOTION FOR PARTIAL SUMMARY
JUDGMENT AGAINST DEFENDANTS
BARRY K. EPLING, FERRIS HOLDING,
INC. AND HOBBS EQUITIES, INC.
(ECF NO. 110); AND (2) PLAINTIFF'S
MOTION FOR PARTIAL SUMMARY
JUDGMENT AGAINST DEFENDANT
BRUCE J. PERLOWIN (ECF NO. 111)**

[FIRST REQUEST]

Pursuant to LR IA 6-1, Plaintiff and Certain Defendants,¹ by and through their attorneys of record, stipulate as follows:

1. On December 13, 2017, Plaintiff filed two dispositive motions (the “Dispositive Motions”): (1) a Motion for Partial Summary Judgment Against Defendants Barry K. Epling, Ferris Holding, Inc. and Hobbes Equities, Inc. (ECF No. 110); and (2) a Motion for Partial Summary Judgment Against Defendant Bruce J. Perlowin (ECF No. 111).

2. Under the Rules, the current deadline for Certain Defendants to respond to the Dispositive Motions is January 3, 2018, and the current deadline for Plaintiff to file replies is January 17, 2018.

3. The parties hereby seek an extension of the response deadlines for Dispositive Motions until February 20, 2018, and until March 23, 2018 for the reply deadlines.

4. This is the parties’ first request for an extension of the response and reply deadlines for the Dispositive Motions.

5. The reasons warranting additional time for the response and reply deadlines are as follows:


- a. Plaintiff has filed two Dispositive Motions against Certain Defendants, responses for which become due immediately following the holidays.
- b. Counsel for both parties will be traveling or otherwise unavailable during portions of this period.
- c. Already pending before the Court are motions for sanctions recently filed by Plaintiff: (1) Motion for Imposition of Sanctions Against Defendants Barry K. Epling, For Fabrication of Evidence and Against Defendants Barry K. Epling and Bruce J. Perlowin for False Testimony (ECF No. 92); and (2) Motion for Imposition of Sanctions Against Defendants Ferris Holdings, Inc., Barry K. Epling, and Hobbes Equities, Inc. for Fabrication of Evidence (ECF No. 97).

¹ “Certain Defendants” are those against whom Plaintiff’s Dispositive Motions [ECF Nos. 110 and 111] are directed: Bruce J. Perlowin, Barry K. Epling, Ferris Holding, Inc. and Hobbes Equities Inc.

1 These motions are set for hearing on February 1, 2018 (ECF No. 107). A
2 resolution of these sanctions motions may affect the issues to be briefed by both
3 parties in relation to the Dispositive Motions.

- 4 d. In addition, two other dispositive motions are pending: (1) Defendants' July 14,
5 2017 Motion for Judgment on the Pleadings (ECF No. 66); and (2) Plaintiff's Aug.
6 9, 2017 Motion for Partial Summary Judgment (ECF No. 76). A resolution of
7 those motions may likewise affect the issues to be briefed by both parties in
8 relation to the Dispositive Motions.
- 9 e. Thomas E. Littler, Counsel for Certain Defendants, is new to the case and will be
10 participating in the preparation of the Dispositive Motions briefing. Additional
11 time may be necessary for Mr. Littler to familiarize himself with the facts and
12 issues raised by the Dispositive Motions in light of the holidays and his existing
13 work load.
- 14 f. Counsel for the SEC has no objection to Certain Defendants' request to extend the
15 deadlines to respond to the Dispositive Motions. Counsel for the SEC also requests
16 additional time to file the reply memorandums in support of the Dispositive
17 Motions as agreed to and provided above.

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19 **IT IS SO ORDERED.**

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22 UNITED STATES DISTRICT JUDGE
23 Dated: December 20, 2017.
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1 **IT IS SO STIPULATED.**

2 DATED December 19, 2017.

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4 /s/ Robert J. Cassity
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Attorneys for Plaintiff Securities
and Exchange Commission

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16
17 **ORDER**

18 IT IS SO ORDERED.

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20 _____
21 U.S. DISTRICT/MAGISTRATE JUDGE

22 DATED: _____
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